

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Asheville Regional Office
County: Rutherford
NC Facility ID: 8100190
Inspector's Name: Patrick Ballard
Date of Last Inspection: 12/16/2014
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Plastic Packaging, Inc. - Plant No. 2 Facility Address: Plastic Packaging, Inc. - Plant No. 2 681 Piney Ridge Road Forest City, NC 28043 SIC: 2759 / Commercial Printing, Nec NAICS: 323111 / Commercial Gravure Printing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:			
Contact Data				Application Data			
Facility Contact Edward Sievers Plant Manager (828) 286-1356 P. O. Box 2029 Hickory, NC 28603	Authorized Contact Edward Sievers Plant Manager (828) 286-1356 P. O. Box 2029 Hickory, NC 28603	Technical Contact Edward Sievers Plant Manager (828) 286-1356 P. O. Box 2029 Hickory, NC 28603	Application Number: 8100190.15A Date Received: 07/10/2015 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08091/T15 Existing Permit Issue Date: 01/07/2014 Existing Permit Expiration Date: 08/31/2016				
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	---	0.2900	216.28	0.2400	0.0200	0.0289	0.0280 [Glycol Ethers, Unlisted - Spec]
2013	---	0.2800	222.38	0.2300	0.0200	0.0893	0.0889 [Glycol Ethers, Unlisted - Spec]
2012	---	0.2600	255.17	0.2200	0.0100	0.1488	0.1483 [Glycol Ethers, Unlisted - Spec]
2011	---	0.2700	181.46	0.2200	0.0200	0.0632	0.0602 [Glycol Ethers, Unlisted - Spec]
2010	---	0.2400	180.01	0.2000	0.0100	0.2393	0.2367 [Glycol Ethers, Unlisted - Spec]
Review Engineer: David Hughes Review Engineer's Signature: Date:					Comments / Recommendations: Issue 08091/T16 Permit Issue Date: Permit Expiration Date:		

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 02Q .0513. The existing Title V permit (08091T15) was issued on January 7, 2014, with an expiration date of August 31, 2016. The renewal application was received on July 10, 2015, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

Plastic Packaging, Inc. - Plant No. 2 is a plastic converter that prints customer designs, patterns, and/or writing onto plastic (polyethylene/polypropylene) film and then converts the material into plastic packaging.

III. History/Background/Application Chronology

Date	Description
09/13/2011	Permit 08091T14 issued as a Modification and Renewal Title V permit.
01/7/2014	Permit 08091T15 issued with Minor Modifications as a Title V permit.
07/10/2015	Permit Application 8100190.15A received as a Title V permit renewal application. The application was deemed complete for processing.
01/29/2016	Annual compliance inspection completed by Patrick Ballard of the ARO.
03/10/2016	DRAFT permit sent to Permittee and ARO for comment prior to public notice and EPA review.
xx/xx/2016	DRAFT permit sent to 30-day public notice and 45-day EPA review. The 30-day public comment period ended xx/xx/2016 with the receipt of no comments. The 45-day EPA review period ended xx/xx/2016 with the receipt of no comments.

IV. Permit Modifications/Changes

Pages	Section	Description of Changes
Cover	-	• Updated permit revision numbers and all dates
1	-	• Updated permit revision numbers and all dates
All	Header	• Updated permit revision numbers
5	2.1 A (table)	• Added Part 63 MACT Subpart KK
7	2.2 A (table)	• Added Part 63 MACT Subpart KK
9 & 10	2.2 A.4	• Added current shell language for Part 63 MACT Subpart KK
15-25	General Conditions	• Updated shell conditions (v4.0 12/17/15)
26	List of Acronyms	• Updated to current list of acronyms

V. Regulatory Review

▪ Emission Source ID No(s). (ES-P2, ES-P6, ES-P7, ES-P9 and ES-P10)

The following regulations have been reviewed and/or modified due to the fact that they were inadvertently overlooked during previous renewal cycles:

15A NCAC 02D .1111 Maximum Achievable Control Technology (40 CFR 63, Subpart KK)

This facility is subject to the Maximum Achievable Control Technology (MACT) standards, in 40 CFR Part 63, Subpart KK entitled “National Emissions Standards for the Printing and Publishing Industry” because the potential emissions of VOC exceed 100 tons per year; however, they are not major for hazardous air pollutants (HAP) because the facility has chosen to commit to, and meet the criteria of 40 CFR 63.820(a)(2)(i) and (a)(2)(ii) for the purposes of establishing the facility as an area source with respect to this MACT standard. In addition, based on the facility’s historical data they appear to be a true minor HAP facility; therefore, a 02Q .0317 Avoidance Condition is NOT necessary.

The applicant shall use less than 10 tons per each rolling 12-month period of each HAP at the facility and use less than 25 tons per rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing. Area sources are not subject to any of the MACT provisions except recordkeeping per 40 CFR 63.829(d).

15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

The PM emissions will most likely be condensable PM from the combustion of natural gas and possibly from the VOC. These PM emissions are small in comparison to the large throughput of the process. Monitoring will consist of tracking process rates and associated recordkeeping. No reporting is required. Compliance with this regulation is expected.

15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

Sulfur dioxide emissions from natural gas combustion are minimal and no sulfur dioxide emissions are expected from the process. No M/R/R will be required as is typical for natural gas combustion sources.

15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

Visible Emissions are not expected from the process equipment. No monitoring recordkeeping or reporting requirements will be included in the permit.

15A NCAC 02D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

The work practices associated with this regulation apply to each VOC source at the facility. Compliance is expected with this regulation.

15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS (State Enforceable Only)

The Permittee shall install operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objective odors beyond the facility’s boundary. Compliance is expected with this regulation.

15A NCAC 02Q .0711: EMISSION RATES REQUIRING A PERMIT (State Enforceable Only)

Like many solvent coating operations, the speciated HAP/TAP emissions may vary from year to year depending on coating usage and production demands. However, this facility uses coating and solvents

generally with low HAP/TAP content, as was verified by a cursory review of the recent few years of emissions inventories. In any case, the potential emission estimates included in the application and revised via email on 12/04/2013 show the emissions of all TAPs are below their respective TPERs.

The "02Q .0711 TPER condition" addresses most if not all expected TAPs that may be emitted by the facility. This condition will remain unchanged.

15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

The facility has a VOC PAL limit of 511 tpy which will include emissions from the presses, solvent recovery system as well as the emergency engine. These sources are subject to the monitoring, recordkeeping and reporting required under the existing permit condition. No further analysis is necessary. Creation of the PAL can be located in the Air Permit Review for Air Permit No. 08091T13.

▪ Emergency generator I-ES-11

This is an existing engine constructed in 1995 that was never referenced in the permit. The 38 HP engine has potential emissions (at 500 hours per year per EPA policy for emergency engines) of NOx (the controlling pollutant) of 0.1 tpy and CO2 of 2.75 tpy.

This unit qualifies as an insignificant activity per 15A NCAC 02Q .0503(3) and as such can be added to this permit.

The source is currently subject to the following regulations:

15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

VI. NSPS, NESHAPS, PSD, Attainment Status, and CAM

NSPS

The facility is not subject to any NSPS Standard. This permit renewal does not affect this status.

NESHAP/MACT

See Section V for applicability of MACT KK on the five printing press and MACT ZZZZ on Emergency Generator I-ES-11.

PSD

See Section V for PSD discussion. The facility is a PSD major source with a PSD PAL limit of 511 tpy. Rutherford County is in attainment for all pollutants.

CAM

No control devices are implemented. CAM does not apply.

VII. Facility Emission Review

See Table above for a summary of the latest years' actual emissions as reported to DAQ.

VIII. Stipulation Review

DAQ has reviewed the compliance status of this facility. During the most recent inspection, conducted on January 29, 2015 by Patrick Ballard of the Asheville Regional Office (ARO), the facility appeared to be in compliance with all applicable requirements.

IX. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. There are no affected States/areas within 50 miles of this facility.

X. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

ARO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with ARO's recommendation to issue the renewed air permit 08091T16.